

LIDMAN LAW, APC

Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Elizabeth Nguyen (SBN 238571)
enguyen@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
222 N. Sepulveda Blvd., Suite 1550
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
ERICK CONTRERAS

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
222 N. Sepulveda Blvd., Suite 1550
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2228

Attorneys for Plaintiff
ERICK CONTRERAS

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

ERICK CONTRERAS, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

v.

WORLDWIDE FLIGHT SERVICES,
INC., a Delaware corporation; and DOES
1 through 100,

Defendants.

Case No.: 2:18-cv-06036-PSG-SS

Assigned to: Hon. Judge Philip S.
Gutierrez

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: April 6, 2020
Time: 1:30 p.m.
Courtroom: 6A

Action Filed: May 4, 2018
Pre-Trial Conf: April 6, 2020
Trial: April 21, 2020

1 NOTICE IS HEREBY GIVEN that on April 6, 2020, at 1:30 p.m. or as soon
2 thereafter as the matter may be heard in Courtroom 6A of the United States District
3 Court for the Central District of California, located at 350 West 1st Street, Los Angeles,
4 California 90012, before the Honorable Judge Philip S. Gutierrez, Plaintiff Erick
5 Contreras, as an individual and on behalf of all others similarly situated, will and hereby
6 does move this Court for entry of an Order pursuant to Fed. R. Civ. Proc. 23(e) granting:

- 7 1. Finally certifying the proposed Settlement Classes under Rule 23(e) of the
8 Federal Rules of Civil Procedure defined as:
 - 9 a. *Non-Bautista* Class Members: All current and former non-exempt
10 employees who worked in California for Defendant Worldwide
11 Flight Services, Inc. from December 1, 2016 through July 25, 2019
12 and who were not class members in *Guillermo Bautista v.*
13 *Worldwide Flight Services, Inc.*, Los Angeles Superior Court Case
14 No. BC622372; and
 - 15 b. *Bautista* Class Members: All current and former non-exempt
16 employees who worked in California for Defendant Worldwide
17 Flight Services, Inc. from April 2, 2017 through July 25, 2019 and
18 who were class members in *Guillermo Bautista v. Worldwide Flight*
19 *Services, Inc.*, Los Angeles Superior Court Case No. BC622372.
- 20 2. Granting final approval to the class action settlement based upon the terms
21 set forth in the Stipulation of Settlement (“Settlement”) as fair, reasonable
22 and adequate under Rule 23(e) of the Federal Rules of Civil Procedure;
- 23 3. Confirming Plaintiff Erick Contreras’s appointment as Class Representative
24 for settlement purposes;
- 25 4. Confirming the appointment of Scott M. Lidman, Elizabeth Nguyen, and
26 Milan Moore of Lidman Law, APC and Paul K. Haines of Haines Law Group,
27 APC, as Class Counsel for settlement purposes;
- 28 5. Entering final judgment in the form of the [Proposed] Order Granting
Plaintiff’s Motion for Final Approval of Class Action Settlement and Final
Judgment filed concurrently herewith.

1 This Motion is based on this Notice of Motion, the attached Memorandum of
2 Points and Authorities, the declarations of Scott M. Lidman, Elizabeth Nguyen, Paul
3 K. Haines, Milan Moore, Erick Contreras, and Alan Garrido of CPT Group, Inc. and
4 the exhibits attached thereto, the pleadings and other papers filed in this action, and on
5 any further oral or documentary evidence or argument presented at the time of hearing.

6
7 Respectfully submitted,
8 Dated: March 6, 2020 Lidman Law, APC

9
10 By: /s/ Elizabeth Nguyen
11 Elizabeth Nguyen
12 Attorney for Plaintiff
13 ERICK CONTRERAS
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28